

**FEDERALLY ENFORCEABLE STATE  
OPERATING PERMIT (FESOP) RENEWAL  
OFFICE OF AIR QUALITY**

**Styline Industries, Inc. - Plant #2  
419 North Washington Street  
Huntingburg, Indiana 47542**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit Renewal No.: F037-13871-00025	
Issued by: Original Signed by Paul Dubentetzky Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: August 20, 2001  Expiration Date: August 20, 2006

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## SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

### A.1 General Information [326 IAC 2-8-3(b)]

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The Permittee owns and operates a stationary wood furniture manufacturing source.

Authorized Individual:	Ray Brooks, Environmental Coordinator
Source Address:	419 North Washington Street, Huntingburg, Indiana 47542
Mailing Address:	P.O. Box 100, Huntingburg, Indiana 47542-0100
General Source Phone Number:	812-683-4848
SIC Code:	2521
County Location:	Dubois
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit (FESOP) Minor Source, under PSD Rules; Minor Source, Section 112 of the Clean Air Act

### A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

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This stationary source consists of the following emission units and pollution control devices:

(a) Eight (8) wood furniture coating booths:

- (1) One (1) wood furniture stain coating booth identified as B-1, installed in 1976, rated at 7.5 units per hour, utilizing an air assisted airless or high volume low pressure (HVLP) application system, with particulate matter over spray controlled by dry filter, and exhausting at two (2) stacks identified as B-1A and B-1B;
- (2) One (1) wood furniture wash coating booth identified as B-2, installed in 1976, rated at 7.5 units per hour, utilizing an air assisted airless or high volume low pressure (HVLP) application system, with particulate matter over spray controlled by dry filter, and exhausting at one (1) stack identified as B-2;
- (3) One (1) wood furniture wipe stain and filler booth identified as B-3, installed in 1976, rated at 7.5 units per hour, utilizing a roll coating and brushing application system, exhausting at one (1) stack identified as B-3;
- (4) One (1) wood furniture sealer coating booth identified as B-4, installed in 1986, rated at 7.5 units per hour, utilizing an air assisted airless or high volume low pressure (HVLP) application system, with particulate matter over spray controlled by dry filter, and exhausting at one (1) stack identified as B-4;

- (5) One (1) wood furniture coating booth identified as B-5, installed in 1986, rated at 7.5 units per hour, utilizing an air assisted airless or high volume low pressure (HVLP) application system, with particulate matter over spray controlled by dry filter, and exhausting at one (1) stack identified as B-5;
  - (6) One (1) wood furniture lacquer coating booth identified as B-6, installed in 1986, rated at 7.5 units per hour, utilizing an air assisted airless or high volume low pressure (HVLP) application system, with particulate matter over spray controlled by dry filter, and exhausting at one (1) stack identified as B-6;
  - (7) One (1) wood furniture lacquer and shade coating booth identified as B-7, installed in 1986, rated at 7.5 units per hour, utilizing an air assisted airless or high volume low pressure (HVLP) application system, with particulate matter over spray controlled by dry filter, and exhausting at two (2) stacks identified as B-7A and B-7B; and
  - (8) One (1) wood furniture coating repair downdraft spray booth identified as B-8, installed in 1986, rated at 7.5 units per hour, utilizing an air assisted airless or high volume low pressure (HVLP) application system, with particulate matter over spray controlled by dry filter, and exhausting at one (1) stack identified as B-8.
- (b) One (1) Plant 2 woodworking operation, installed in or prior to 1976, rated at 1,515 pounds raw materials per hour, including three (3) edge sanders, one (1) 36-inch bands, one (1) boring machine, one (1) multi-drill, one (1) single spindle shape, one (1) horizontal drill, three (3) routers, one (1) tenon machine, one (1) dovetail machine, one (1) automatic sharpener, one (1) mould sander, one (1) belt polisher, one (1) uni-point saw, one (1) sander, and two (2) mortisers, all controlled by one (1) baghouse identified as the Carter-Day Dust Collection System.
  - (c) One (1) bituminous coal fired boiler with underfeed stoker and overfire air, installed in 1975, rated at 5.03 million British thermal units per hour (MMBtu/hr), exhausting at one (1) stack identified as boiler stack.

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour. This includes four (4) natural gas-fired drying ovens and three (3) natural gas-fired air make-up units;
- (b) machining where an aqueous cutting coolant continuously floods the machining interface;
- (c) water based adhesives that are less than or equal to 5% by volume of VOCs excluding HAPS;
- (d) blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower;

- (e) one (1) steam air make-up unit;
- (f) one (1) 75 HP air compressor; and
- (g) one (1) 15 HP air compressor.

A.4 FESOP Applicability [326 IAC 2-8-2]

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This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) to renew a Federally Enforceable State Operating Permit (FESOP).

A.5 Prior Permit Conditions

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- (a) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits.
- (b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, including any term or condition from a previously issued construction or operation permit, IDEM, OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued.

## **SECTION B                      GENERAL CONDITIONS**

### **B.1      Permit No Defense [IC 13]**

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a FESOP under 326 IAC 2-8.

### **B.2      Definitions [326 IAC 2-8-1]**

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2, and 326 IAC 2-7) shall prevail.

### **B.3      Permit Term [326 IAC 2-8-4(2)]**

This permit is issued for a fixed term of five (5) years from the original date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.

### **B.4      Enforceability [326 IAC 2-8-6]**

Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

### **B.5      Termination of Right to Operate [326 IAC 2-8-9] [326 IAC 2-8-3(h)]**

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-8-3(h) and 326 IAC 2-8-9.

### **B.6      Severability [326 IAC 2-8-4(4)]**

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

### **B.7      Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]**

This permit does not convey any property rights of any sort, or any exclusive privilege.

### **B.8      Duty to Supplement and Provide Information [326 IAC 2-8-3(f)] [326 IAC 2-8-4(5)(E)] [326 IAC 2-8-5(a)(4)]**

- (a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit or, for information claimed to be confidential, the Permittee may furnish such records directly to the U. S. EPA along with a claim of confidentiality.[326 IAC 2-8-4(5)(E)]
- (c) The Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.9 Compliance Order Issuance [326 IAC 2-8-5(b)]

IDEM, OAQ, may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

B.10 Compliance with Permit Conditions [326 IAC 2-8-4(5)(A)] [326 IAC 2-8-4(5)(B)]

- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for:
  - (1) Enforcement action;
  - (2) Permit termination, revocation and reissuance, or modification; and
  - (3) Denial of a permit renewal application.
- (b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
- (c) An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in condition B, Emergency Provisions.

B.11 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by an authorized individual of truth, accuracy, and completeness. This certification, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.
- (c) An authorized individual is defined at 326 IAC 2-1.1-1(1).

**B.12 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]**

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- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. All certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1 of each year to:
- Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015
- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
- (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
  - (2) The compliance status;
  - (3) Whether compliance was continuous or intermittent;
  - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and
  - (5) Such other facts as specified in Sections D of this permit, IDEM, OAQ, may require to determine the compliance status of the source.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

**B.13 Preventive Maintenance Plan [326 IAC 1-6-3] [326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]**

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- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs), including the following information on each facility:
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
  - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and

- (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
- (b) The Permittee shall implement the PMPs as necessary to ensure that failure to implement a PMP does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or contributes to any violation. The PMP does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (d) Records of preventive maintenance shall be retained for a period of at least five (5) years. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

**B.14 Emergency Provisions [326 IAC 2-8-12]**

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- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-8-12.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describes the following:
  - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
  - (2) The permitted facility was at the time being properly operated;
  - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;

- (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, and the IDEM Southwest Regional Office, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone No.: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section) or,  
Telephone No.: 317-233-5674 (ask for Compliance Section)  
Facsimile No.: 317-233-5967

Telephone No.: 812-436-2570 (Southwest Regional Office)  
Facsimile No.: 812-436-2572 (Southwest Regional Office)

Failure to notify IDEM, OAQ, and the IDEM Southwest Regional Office, by telephone or facsimile within four (4) daytime business hours after the beginning of the emergency, or after the emergency is discovered or reasonably should have been discovered, shall constitute a violation of 326 IAC 2-8 and any other applicable rules. [326 IAC 2-8-12(f)]

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-8-4(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.

- (e) IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
  - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
  - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
    - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
    - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

**B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]**

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provision), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report.

The notification by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:
  - (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or

- (2) Failure to implement elements of the Preventive Maintenance Plan unless such failure has caused or contributed to a deviation.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.

- (c) Emergencies shall be included in the Quarterly Deviation and Compliance Monitoring Report.

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination

[326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a FESOP modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ, determines any of the following:
  - (1) That this permit contains a material mistake.
  - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
  - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]
- (c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

**B.17 Permit Renewal [326 IAC 2-8-3(h)]**

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- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ, and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, IN 46206-6015

- (b) Timely Submittal of Permit Renewal [326 IAC 2-8-3]

- (1) A timely renewal application is one that is:

- (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
- (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

- (2) If IDEM, OAQ, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.

- (c) Right to Operate After Application for Renewal [326 IAC 2-8-9]

If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAQ, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, any additional information identified as needed to process the application.

**B.18 Permit Amendment or Revision [326 IAC 2-8-10] [326 IAC 2-8-11.1]**

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- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.

- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

Any such application shall be certified by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) The Permittee may implement the administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

**B.19 Operational Flexibility [326 IAC 2-8-15]**

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- (a) The Permittee may make any change or changes at this source that are described in 326 IAC 2-8-15(b) through (d), without prior permit revision, if each of the following conditions is met:

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any approval required by 326 IAC 2-8-11.1 has been obtained;
- (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
- (4) The Permittee notifies the:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V  
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

- (5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-8-15(b) through (d) and makes such records available, upon reasonable request, to public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ, in the notices specified in 326 IAC 2-8-15(b), (c)(1), and (d).

- (b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-8-15(a) and the following additional conditions:

- (1) A brief description of the change within the source;
- (2) The date on which the change will occur;
- (3) Any change in emissions; and
- (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

- (c) Emission Trades [326 IAC 2-8-15(c)]  
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).
- (d) Alternative Operating Scenarios [326 IAC 2-8-15(d)]  
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ or U.S. EPA is required.

**B.20 Permit Revision Requirement [326 IAC 2-8-11.1]**

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A modification, construction, or reconstruction is governed under 326 IAC 2 and 326 IAC 2-8-11.1.

**B.21 Inspection and Entry [326 IAC 2-8-5(a)(2)] [IC 13-14-2-2]**

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Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

- (c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

**B.22 Transfer of Ownership or Operational Control [326 IAC 2-8-10]**

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- (a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

The application which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-11(b)(3)]

**B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16]**

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- (a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) Failure to pay may result in administrative enforcement action, or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAQ, Technical Support and Modeling Section), to determine the appropriate permit fee.

## SECTION C SOURCE OPERATION CONDITIONS

Entire Source
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### Emissions Limitations and Standards [326 IAC 2-8-4(1)]

#### C.1 Overall Source Limit [326 IAC 2-8]

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

(a) Pursuant to 326 IAC 2-8:

- (1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one-hundred (100) tons per twelve (12) consecutive month period. This limitation shall also make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable;
- (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
- (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.

(b) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided that the source's potential to emit does not exceed the above specified limits.

(c) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

#### C.2 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

**C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]**

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3(a)(2)(A) and (B) are not federally enforceable.

**C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]**

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and in 326 IAC 9-1-2. 326 IAC 9-1-2 is not federally enforceable.

**C.5 Fugitive Dust Emissions [326 IAC 6-4]**

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

**C.6 Operation of Equipment [326 IAC 2-8-5(a)(4)]**

Except as otherwise provided by statute, rule or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

**C.7 Stack Height [326 IAC 1-7]**

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted. The provisions of 326 IAC 1-7-2, 326 IAC 1-7-3(c) and (d), 326 IAC 1-7-4(d), (e), and (f), and 326 IAC 1-7-5(d) are not federally enforceable.

**C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]**

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
  - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
  - (2) If there is a change in the following:
    - (A) Asbestos removal or demolition start date;
    - (B) Removal or demolition contractor; or
    - (C) Waste disposal site.

- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management  
Asbestos Section, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

The notifications do not require a certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (e) **Procedures for Asbestos Emission Control**  
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4 emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Indiana Accredited Asbestos Inspector**  
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited, pursuant to the provisions of 40 CFR 61, Subpart M, is federally enforceable.

### **Testing Requirements [326 IAC 2-8-4(3)]**

#### **C.9 Performance Testing [326 IAC 3-6]**

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- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ, not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the source submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

#### **Compliance Requirements [326 IAC 2-1.1-11]**

##### **C.10 Compliance Requirements [326 IAC 2-1.1-11]**

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

#### **Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]**

##### **C.11 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]**

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented upon issuance of this permit. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment.

Unless otherwise specified in the approval for the new emissions unit, compliance monitoring for new emission units or emission units added through a permit revision shall be implemented when operation begins.

##### **C.12 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]**

Any monitoring or testing performed required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60 Appendix B, 40 CFR 63 or other approved methods as specified in this permit.

#### **Corrective Actions and Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]**

##### **C.13 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68.215]**

If a regulated substance, subject to 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall submit:

- (a) A compliance schedule for meeting the requirements of 40 CFR 68; or
- (b) As a part of the annual compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP).

All documents submitted pursuant to this condition shall include the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

C.14 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5]

- (a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. The compliance monitoring plan can be either an entirely new document, consist in whole of information contained in other documents, or consist of a combination of new information and information contained in other documents. If the compliance monitoring plan incorporates by reference information contained in other documents, the Permittee shall identify as part of the compliance monitoring plan the documents in which the information is found. The elements of the compliance monitoring plan are:
  - (1) This condition;
  - (2) The Compliance Determination Requirements in Section D of this permit;
  - (3) The Compliance Monitoring Requirements in Section D of this permit;
  - (4) The Record Keeping and Reporting Requirements in Section C (General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and
  - (5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAQ, upon request and shall be subject to review and approval by IDEM, OAQ. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of:
    - (A) Reasonable response steps that may be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and
    - (B) A time schedule for taking reasonable response steps including a schedule for devising additional response steps for situations that may not have been predicted.
- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to take reasonable response steps may constitute a violation of the permit.
- (c) Upon investigation of a compliance monitoring excursion, the Permittee is excused from taking further response steps for any of the following reasons:
  - (1) A false reading occurs due to the malfunction of the monitoring equipment. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.
  - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied.

- (3) An automatic measurement was taken when the process was not operating.
- (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.
- (d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.
- (e) All monitoring required in Section D shall be performed at all times the equipment is operating. If monitoring is required by Section D and the equipment is not operating, then the Permittee may record the fact that the equipment is not operating or perform the required monitoring.
- (f) At its discretion, IDEM may excuse the Permittee's failure to perform the monitoring and record keeping as required by Section D, if the Permittee provides adequate justification and documents that such failures do not exceed five percent (5%) of the operating time in any quarter. Temporary, unscheduled unavailability of qualified staff shall be considered a valid reason for failure to perform the monitoring or record keeping requirements in Section D.

C.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4]  
[326 IAC 2-8-5]

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- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The documents submitted pursuant to this condition do not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

## **Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]**

### **C.16 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]**

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- (a) Records of all required data, reports and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

### **C.17 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]**

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- (a) The source shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "authorized individual" as defined by 326 IAC2-1.1-1(1).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:  
  
Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (e) Reporting periods are based on calendar years.

### **Stratospheric Ozone Protection**

#### **C.18 Compliance with 40 CFR 82 and 326 IAC 22-1**

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Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair or disposal must comply with the required practices pursuant to 40 CFR 82.156
- (b) Equipment used during the maintenance, service, repair or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

## SECTION D.1

## FACILITY OPERATION CONDITIONS

### **Facility Description [326 IAC 2-8-4(10)]:**

(a) Eight (8) wood furniture coating booths:

- (1) One (1) wood furniture stain coating booth identified as B-1, installed in 1976, rated at 7.5 units per hour, utilizing an air assisted airless or high volume low pressure (HVLP) application system, with particulate matter over spray controlled by dry filter, and exhausting at two (2) stacks identified as B-1A and B-1B;
- (2) One (1) wood furniture wash coating booth identified as B-2, installed in 1976, rated at 7.5 units per hour, utilizing an air assisted airless or high volume low pressure (HVLP) application system, with particulate matter over spray controlled by dry filter, and exhausting at one (1) stack identified as B-2;
- (3) One (1) wood furniture wipe stain and filler booth identified as B-3, installed in 1976, rated at 7.5 units per hour, utilizing a roll coating and brushing application system, exhausting at one (1) stack identified as B-3;
- (4) One (1) wood furniture sealer coating booth identified as B-4, installed in 1986, rated at 7.5 units per hour, utilizing an air assisted airless or high volume low pressure (HVLP) application system, with particulate matter over spray controlled by dry filter, and exhausting at one (1) stack identified as B-4;
- (5) One (1) wood furniture coating booth identified as B-5, installed in 1986, rated at 7.5 units per hour, utilizing an air assisted airless or high volume low pressure (HVLP) application system, with particulate matter over spray controlled by dry filter, and exhausting at one (1) stack identified as B-5;
- (6) One (1) wood furniture lacquer coating booth identified as B-6, installed in 1986, rated at 7.5 units per hour, utilizing an air assisted airless or high volume low pressure (HVLP) application system, with particulate matter over spray controlled by dry filter, and exhausting at one (1) stack identified as B-6;
- (7) One (1) wood furniture lacquer and shade coating booth identified as B-7, installed in 1986, rated at 7.5 units per hour, utilizing an air assisted airless or high volume low pressure (HVLP) application system, with particulate matter over spray controlled by dry filter, and exhausting at two (2) stacks identified as B-7A and B-7B; and
- (8) One (1) wood furniture coating repair downdraft spray booth identified as B-8, installed in 1986, rated at 7.5 units per hour, utilizing an air assisted airless or high volume low pressure (HVLP) application system, with particulate matter over spray controlled by dry filter, and exhausting at one (1) stack identified as B-8.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

## **Emission Limitations and Standards [326 IAC 2-8-4(1)]**

### **D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-12]**

Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), the surface coating applied in booths B-4 through B-8 to wood furniture shall utilize one of the following application methods:

- Airless Spray Application
- Air Assisted Airless Spray Application
- Electrostatic Spray Application
- Electrostatic Bell or Disc Application
- Heated Airless Spray Application
- Roller Coating
- Brush or Wipe Application
- Dip-and-Drain Application

High Volume Low Pressure (HVLP) Spray Application is an accepted alternative method of application for Air Assisted Airless Spray Application. HVLP spray is the technology used to apply coating to substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

### **D.1.2 Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAPs) [326 IAC 2-8]**

The source shall comply as follows:

- (a) The total input usage of volatile organic compounds (VOC) at coating booths B-1 through B-8, including VOC solvent and diluent usage, shall be less than 98.8 tons per twelve (12) consecutive month period. Compliance with this condition shall limit the source-wide potential to emit VOC to less than 100 tons per twelve (12) consecutive month period.
- (b) The total input usage of any single hazardous air pollutant (HAP) at coating booths B-1 through B-8, including solvent and diluent usage, shall be less than 9.9 tons per 12 consecutive month period. Compliance with this condition shall limit the source-wide potential to emit a single HAP to less than 10 tons per twelve (12) consecutive month period.
- (c) The total input usage of the combined HAPs at coating booths B-1 through B-8, including solvent and diluent usage, shall be less than 24.9 tons per twelve (12) consecutive month period. Compliance with this condition shall limit the source-wide potential to emit total HAPs to less than 10 tons per 12 consecutive month period.

Compliance with these limitations shall make the requirements of 326 IAC 2-7 (Part 70) not applicable to the source.

**D.1.3 Particulate Matter (PM) [326 IAC 6-3-2]**

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Pursuant to 326 IAC 6-3-2, the particulate matter as overspray from coating booths B-1 through B-8 each shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

or

Interpolation and extrapolation of the data for the process weight rate in excess of sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 55.0 P^{0.11} - 40 \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour.}$$

**D.1.4 PM<sub>10</sub> Emission Limitation [326 IAC 2-8-4]**

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The total PM<sub>10</sub> emissions from the coating booths B-1 through B-8 shall not exceed 2.7 tons per twelve (12) consecutive month period, equivalent to 0.61 pounds per hour based on 8,760 hours of operation per 12 consecutive month period. Therefore, the requirements of 326 IAC 2-7 do not apply.

**D.1.5 Preventive Maintenance Plan [326 IAC 2-8-4(9)]**

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A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and control devices.

**Compliance Determination Requirements**

**D.1.6 Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAP)**

---

Compliance with the VOC and HAP usage limitations contained in Condition D.1.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer.

**D.1.7 VOC and HAP Emissions**

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Compliance with Condition D.1.2 shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound, single HAP and combined HAP usage for the most recent twelve (12) month period.

**Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]**

**D.1.8 Particulate Matter (PM)**

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In order to comply with D.1.3 and D.1.4, the dry filters for PM control shall be in operation at all times when the eight (8) coating booths (B1 through B8) are in operation.

#### D.1.9 Monitoring

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- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth B-1 through B-8 stacks (B-1A, B-1B, B-2, B-3, B-4, B-5, B-6, B-7A, B-7B, and B-8) while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

#### **Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]**

##### D.1.10 Record Keeping Requirements

---

- (a) To document compliance with Condition D.1.2, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC and HAP usage limits established in Condition D.1.2.
  - (1) The amount and VOC and HAP content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
  - (2) A log of the dates of use;
  - (3) Method of application for each wood furniture coating used;
  - (4) The total VOC usage for each month and the weight of VOCs emitted for each compliance period; and
  - (5) The total HAP usage for each month and the weight of individual and total HAPs emitted for each compliance period.
- (b) To document compliance with Condition D.1.9, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.

- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### D.1.11 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.2 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

## SECTION D.2

## FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-8-4(10)]:

- (b) One (1) Plant 2 woodworking operation, installed in or prior to 1976, rated at 1,515 pounds raw materials per hour, including three (3) edge sanders, one (1) 36-inch bands, one (1) boring machine, one (1) multi-drill, one (1) single spindle shape, one (1) horizontal drill, three (3) routers, one (1) tenon machine, one (1) dovetail machine, one (1) automatic sharpener, one (1) mould sander, one (1) belt polisher, one (1) uni-point saw, one (1) sander, and two (2) mortisers, all controlled by one (1) baghouse identified as the Carter-Day Dust Collection System.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

### Emission Limitations and Standards [326 IAC 2-8-4(1)]

#### D.2.1 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Process Operations), the allowable PM emission rate from the Plant #2 woodworking operation shall not exceed 3.40 pounds per hour when operating at a process weight rate of 1,515 pounds per hour.

The pounds per hour limitation was calculated with the following equation:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour.}$$

#### D.2.2 PM<sub>10</sub> Emission Limitation [326 IAC 2-8-4]

The total PM<sub>10</sub> emissions from the Plant #2 woodworking operation shall not exceed 14.9 tons per twelve (12) consecutive month period, equivalent to 3.40 pounds per hour based on 8,760 hours of operation per 12 consecutive month period. Therefore, the requirements of 326 IAC 2-7 do not apply.

#### D.2.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and its control device.

### Compliance Determination Requirements

#### D.2.4 Particulate Matter (PM)

In order to comply with Condition D.2.1 and D.2.2, the Carter-Day Dust Collection System (i.e., baghouse) for PM control shall be in operation and control emissions from the Plant #2 woodworking operation at all times that the woodworking equipment is in operation.

## **Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]**

### **D.2.5 Visible Emissions Notations**

---

- (a) Daily visible emission notations of the Carter-Day Dust Collection System stack exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

### **D.2.6 Baghouse Inspections**

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An inspection shall be performed each calendar quarter of all bags controlling the woodworking operation when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting indoors. All defective bags shall be replaced.

### **D.2.7 Broken or Failed Bag Detection**

---

In the event that bag failure has been observed:

- (a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if there are no visible emissions or if the event qualifies as an emergency and the Permittee satisfies the emergency provisions of this permit (Section B- Emergency Provisions). Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (b) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

**Record Keeping and Reporting Requirement [326 IAC 2-8-4(3)] [326 IAC 2-8-16]**

**D.2.8 Record Keeping Requirements**

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- (a) To document compliance with Condition D.2.5, the Permittee shall maintain records of daily visible emission notations of the Carter-Day Dust Collection System stack exhaust.
- (b) To document compliance with Condition D.2.6, the Permittee shall maintain records of the results of the inspections required under Condition D.2.6 and the dates the vents are redirected.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

There are no facility specific reporting requirements for Section D.2.

## SECTION D.3 FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-8-4(10)]:

- (c) One (1) bituminous coal fired boiler with underfeed stoker and overfire air, installed in 1975, rated at 5.03 million British thermal units per hour (MMBtu/hr), exhausting at one (1) stack identified as boiler stack.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

### Emission Limitations and Standards [326 IAC 2-8-4(1)]

#### D.3.1 Sulfur Dioxide (SO<sub>2</sub>) [326 IAC 7-1.1-1]

Pursuant to 326 IAC 7-1.1 (SO<sub>2</sub> Emissions Limitations), the SO<sub>2</sub> emissions from the 5.03 MMBtu/hr bituminous coal fired boiler shall not exceed 6.0 pound per MMBtu heat input. This is equivalent to a maximum fuel sulfur content of 4.65 percent while combusting coal.

#### D.3.2 Bituminous Coal Usage [326 IAC 2-8]

The source shall limit the consumption of bituminous coal from the 5.03 million British thermal units per hour boiler to less than 1,387.5 tons per twelve (12) consecutive month period. Compliance with this condition shall limit the source-wide potential to emit sulfur dioxide (SO<sub>2</sub>) to less than 100 tons per 12 consecutive month period and make the requirements of 326 IAC 2-7 (Part 70) not applicable to the source.

#### D.3.3 Particulate Matter (PM) [326 IAC 6-2-3]

Pursuant to 326 IAC 6-2-3 (Particulate Matter Emission Limitations for Sources of Indirect Heating), the PM emissions from the boiler shall be limited to 0.6 pounds per MMBtu heat input determined as the lesser of the value *Pt* computed with the following formula:

$$Pt = \frac{C \times a \times h}{76.5 \times Q^{0.75} \times N^{0.25}}$$

where

- Pt* = pounds of PM emitted per MMBtu heat input (lb/MMBtu)  
*C* = maximum ground-level concentration (50 micrograms per cubic meter)  
*a* = plume rise factor (0.67 for *Q* less than 1,000 MMBtu/hr)  
*h* = stack height (feet)  
*Q* = total source operating capacity rating (MMBtu/hr)  
*N* = number of stacks in fuel burning operation

or six tenths (0.6) pounds per MMBtu heat input for *Q* less than 250 MMBtu per hour.

#### D.3.4 PM<sub>10</sub> Emission Limitation [326 IAC 2-8-4]

The PM<sub>10</sub> emissions from the bituminous coal fired boiler shall not exceed 5.73 tons per twelve (12) consecutive month period, equivalent to 1.31 pounds per hour based on 8,760 hours of operation per 12 consecutive month period. Therefore, the requirements of 326 IAC 2-7 do not apply.

**D.3.5 Preventive Maintenance Plan [326 IAC 2-8-4(9)]**

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility.

**Compliance Determination Requirements**

**D.3.6 Sulfur Dioxide (SO<sub>2</sub>) Emissions and Sulfur Content**

Pursuant to 326 IAC 7-2, the Permittee shall demonstrate that the sulfur dioxide emissions do not exceed the allowable limit of Condition D.3.1, six (6.0) pounds SO<sub>2</sub> per MMBtu. Compliance shall be determined utilizing one of the following options:

- (a) Providing vendor analysis of coal delivered, if accompanied by a certification from the fuel supplier, as described under 40 CFR 60.48c(f)(3). The certification shall include:
  - (1) The name of the coal supplier; and
  - (2) The location of the coal when the sample was collected for analysis to determine the properties of the coal, specifically including whether the coal was sampled as delivered to the affected facility or whether the coal was collected from coal in storage at the mine, at a coal preparation plant, at a coal supplier's facility, or at another location. The certification shall include the name of the coal mine (and coal seam), coal storage facility, or coal preparation plant (where the sample was collected); and
  - (3) The results of the analysis of the coal from which the shipment came (or of the shipment itself) including the sulfur content, moisture content, ash content, and heat content; and
  - (4) The methods used to determine the properties of the coal; or
- (b) Sampling and analyzing the coal by using one of the following procedures:
  - (1) Minimum Coal Sampling Requirements and Analysis Methods:
    - (A) The coal sample acquisition point shall be at a location where representative samples of the total coal flow to be combusted by the facility or facilities may be obtained. A single as-bunkered or as-burned sampling station may be used to represent the coal to be combusted by multiple facilities using the same stockpile feed system;
    - (B) Coal shall be sampled at least one (1) time per day;
    - (C) Minimum sample size shall be five hundred (500) grams;
    - (D) Samples shall be composited and analyzed at the end of each calendar quarter;
    - (E) Preparation of the coal sample, heat content analysis, and sulfur content analysis shall be determined pursuant to 326 IAC 3-7-2(c), (d), (e); or

- (2) Sample and analyze the coal pursuant to 326 IAC 3-7-3; or
- (c) Compliance may also be determined by conducting a stack test for sulfur dioxide emissions from the boiler, using 40 CFR 60, Appendix A, Method 6 in accordance with the procedures in 326 IAC 3-6, which is conducted with such frequency as to generate the amount of information required by (a) or (b) above. [326 IAC 7-2-1(b)]

A determination of noncompliance pursuant to any of the methods specified in (a), (b), or (c) above shall not be refuted by evidence of compliance pursuant to the other method.

#### **Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]**

##### **D.3.7 Visible Emissions Notations**

---

- (a) Visible emission notations of the boiler stack exhaust shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

#### **Record Keeping and Reporting Requirement [326 IAC 2-8-4(3)] [326 IAC 2-8-16]**

##### **D.3.8 Record Keeping Requirements**

---

- (a) To document compliance with Conditions D.3.1 and D.3.2, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the SO<sub>2</sub> emission limits established in Conditions D.3.1 and D.3.2.
  - (1) Calendar dates covered in the compliance determination period;
  - (2) Actual coal usage since last compliance determination period;
  - (3) Sulfur content and heat content;
  - (4) Sulfur dioxide emission rates; and;
  - (5) Vendor analysis of coal and coal supplier certification.

- (b) To document compliance with Condition D.3.7, the Permittee shall maintain records of visible emission notations of the boiler stack exhaust while combusting coal.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### D.3.9 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.3.2 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE BRANCH  
100 North Senate Avenue  
P.O. Box 6015  
Indianapolis, Indiana 46206-6015**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)  
CERTIFICATION**

Source Name: Styline Industries, Inc. - Plant #2  
Source Address: 419 North Washington Street, Huntingburg, Indiana 47542  
Mailing Address: P.O. Box 100, Huntingburg, Indiana 47542-0100  
FESOP No.: F037-13871-00025

**This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.**

Please check what document is being certified:

- 9 Annual Compliance Certification Letter
- 9 Test Result (specify) \_\_\_\_\_
- 9 Report (specify) \_\_\_\_\_
- 9 Notification (specify) \_\_\_\_\_
- 9 Affidavit (specify) \_\_\_\_\_
- 9 Other (specify) \_\_\_\_\_

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Phone:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE BRANCH  
100 North Senate Avenue  
P.O. Box 6015  
Indianapolis, Indiana 46206-6015  
Phone: 317-233-5674  
Fax: 317-233-5967**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)  
EMERGENCY OCCURRENCE REPORT**

Source Name: Styline Industries, Inc. - Plant #2  
Source Address: 419 North Washington Street, Huntingburg, Indiana 47542  
Mailing Address: P.O. Box 100, Huntingburg, Indiana 47542-0100  
FESOP No.: F037-13871-00025

**This form consists of 2 pages**

**Page 1 of 2**

**9** This is an emergency as defined in 326 IAC 2-7-1(12)  
CThe Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and  
CThe Permittee must submit notice in writing or by facsimile within two (2) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:

Control Equipment:

Permit Condition or Operation Limitation in Permit:

Description of the Emergency:

Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A

Page 2 of 2

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency?    Y    N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO <sub>2</sub> , VOC, NO <sub>x</sub> , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: \_\_\_\_\_  
Title / Position: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_

A certification is not required for this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR MANAGEMENT  
COMPLIANCE BRANCH  
100 North Senate Avenue  
P.O. Box 6015  
Indianapolis, Indiana 46206-6015**

**FESOP Quarterly Report**

Source Name: Styline Industries, Inc. - Plant #2  
Source Address: 419 North Washington Street, Huntingburg, Indiana 47542  
Mailing Address: P.O. Box 100, Huntingburg, Indiana 47542-0100  
FESOP No.: F037-13871-00025  
Facilities: Coating Booths B-1 through B-8  
Parameter: Total VOC and Single and Combined Hazardous Air Pollutants (HAPs)  
Limits: (a) The total input usage of volatile organic compounds (VOC) at coating booths B-1 through B-8, including VOC solvent and diluent usage, shall be less than 98.8 tons per twelve (12) consecutive month period.  
(b) The total input usage of any single hazardous air pollutant (HAP) at coating booths B-1 through B-8, including solvent and diluent usage, shall be less than 9.9 tons per 12 consecutive month period.  
(c) The total input usage of the combined HAPs at coating booths B-1 through B-8, including solvent and diluent usage, shall be less than 24.9 tons per twelve (12) consecutive month period.

YEAR: \_\_\_\_\_

Month	Total Usage This Month (tons)			Total Usage Previous 11 Months (tons)			Total Usage 12 Months (tons)		
	VOC	Single HAP	Combined HAPs	VOC	Single HAP	Combined HAPs	VOC	Single HAP	Combined HAPs
Month 1									
Month 2									
Month 3									

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.

Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_

Title / Position: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR MANAGEMENT  
COMPLIANCE BRANCH  
100 North Senate Avenue  
P.O. Box 6015  
Indianapolis, Indiana 46206-6015**

**FESOP Quarterly Report**

Source Name: Styline Industries, Inc. - Plant #2  
Source Address: 419 North Washington Street, Huntingburg, Indiana 47542  
Mailing Address: P.O. Box 100, Huntingburg, Indiana 47542-0100  
FESOP No.: F037-13871-00025  
Facility: 5.03 million British thermal units per hour boiler  
Parameter: Coal usage as surrogate parameter for sulfur dioxide (SO<sub>2</sub>)  
Limit: Consumption of bituminous coal shall be less than 1,387.5 tons per twelve (12) consecutive month period

YEAR: \_\_\_\_\_

Month	Coal Usage This Month (tons)	Coal Usage Previous 11 Months (tons)	Total Usage Last 12 Months (tons)
Month 1			
Month 2			
Month 3			

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.  
Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_  
Title/Position: \_\_\_\_\_  
Signature: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE BRANCH**

**100 North Senate Avenue  
P.O. Box 6015  
Indianapolis, Indiana 46206-6015**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)  
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Styline Industries, Inc. - Plant #2  
Source Address: 419 North Washington Street, Huntingburg, Indiana 47542  
Mailing Address: P.O. Box 100, Huntingburg, Indiana 47542-0100  
FESOP No.: F037-13871-00025

**Months:** \_\_\_\_\_ **to** \_\_\_\_\_ **Year:** \_\_\_\_\_

Page 1 of 2

This report is an affirmation that the source has met all the requirements stated in this permit. This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

**Permit Requirement** (specify permit condition #)

**Date of Deviation:**

**Duration of Deviation:**

**Number of Deviations:**

**Probable Cause of Deviation:**

**Response Steps Taken:**

**Permit Requirement** (specify permit condition #)

**Date of Deviation:**

**Duration of Deviation:**

**Number of Deviations:**

**Probable Cause of Deviation:**

**Response Steps Taken:**

<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	

  

<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	

  

<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	

Form Completed By: \_\_\_\_\_

Title/Position: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

## Indiana Department of Environmental Management Office of Air Quality

### Addendum to the Technical Support Document for Federally Enforceable State Operating Permit (FESOP) Renewal

**Source Name:** Styline Industries, Inc.  
**Source Location:** Styline Plant #2, 419 North Washington Street, Huntingburg, Indiana 47542  
**County:** Dubois  
**SIC Code:** 2521  
**Operation Permit No.:** F037-13871-00025  
**Permit Reviewer:** Michael Hirtler / EVP

On July 3, 2001, the Office of Air Quality (OAQ) had a notice published in The Herald, in Jasper, Indiana, stating that Styline Industries, Inc. had applied for a Federally Enforceable State Operating Permit (FESOP) Renewal to operate a stationary wood furniture manufacturing source with control. The notice also stated that OAQ proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

Upon further review, the OAQ has decided to make changes to the FESOP Renewal to provide for grammatical accuracy and greater clarity. The following highlights the changes made to this permit, with new language in bold and deleted language with a line through it:

1. Condition B.10 (Compliance with Permit Conditions) has been revised to clarify that noncompliance with any requirement of this permit may result in an enforcement action against the permittee, an action to modify, revoke, reissue or terminate the source's permit, and/or a denial of the permittee's application to renew the permit.

**B.10 Compliance with Permit Conditions [326 IAC 2-8-4(5)(A)] [326 IAC 2-8-4(5)(B)]**

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- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit, ~~except those specifically designated as not federally enforceable~~, is grounds for:
    - (1) Enforcement action;
    - (2) Permit termination, revocation and reissuance, or modification; and
    - (3) Denial of a permit renewal application.
  - (b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
  - (c) An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in condition B, Emergency Provisions.
2. Condition B.11(a) (Certification) has been revised to provide for grammatical accuracy as

follows:

**B.11 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]**

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- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by an authorized individual of truth, accuracy, and completeness. This certification, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.
- (c) An authorized individual is defined at 326 IAC 2-1.1-1(1).

3. Condition B.20 (Permit Revision Requirement) has been revised to provide for grammatical accuracy as follows:

**B.20 Permit Revision Requirement [326 IAC 2-8-11.1]**

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A modification, construction, or reconstruction is governed **under** 326 IAC 2 and 326 IAC 2-8-11.1.

## **Indiana Department of Environmental Management Office of Air Quality**

### **Technical Support Document (TSD) for a Federally Enforceable State Operating Permit (FESOP) Renewal**

#### **Source Background And Description**

**Source Name:** Styline Industries, Inc.  
**Source Location:** Styline Plant #2, 419 North Washington Street, Huntingburg,  
Indiana 47542  
**County:** Dubois  
**SIC Code:** 2521  
**Operation Permit No.:** F037-13871-00025  
**Permit Reviewer:** Michael Hirtler / EVP

The Office of Air Quality (OAQ) has reviewed a FESOP renewal application from Styline Industries, Inc. relating to the operation of the Plant #2 office furniture manufacturing source. The previous FESOP, F037-5730-00025, issued December 13, 1996, identified the source as Plant #2 and Plant #4. The source has since removed the equipment at Plant #4, and the Plant #4 identifier has been eliminated from the source name. Styline Industries, Inc. was issued FESOP F037-5730-00025 on December 13, 1996 that will expire on December 13, 2001.

#### **Permitted Emission Units and Pollution Control Equipment**

The source consists of the following permitted emission units and pollution control devices:

- (a) Eight (8) wood furniture coating booths:
  - (1) One (1) wood furniture stain coating booth identified as B-1, installed in 1976, rated at 7.5 units per hour, utilizing an air assisted airless or high volume low pressure (HVLP) application system, with particulate matter over spray controlled by dry filter, and exhausting at two (2) stacks identified as B-1A and B-1B;
  - (2) One (1) wood furniture wash coating booth identified as B-2, installed in 1976, rated at 7.5 units per hour, utilizing an air assisted airless or high volume low pressure (HVLP) application system, with particulate matter over spray controlled by dry filter, and exhausting at one (1) stack identified as B-2;
  - (3) One (1) wood furniture wipe stain and filler booth identified as B-3, installed in 1976, rated at 7.5 units per hour, utilizing a roll coating and brushing application system, exhausting at one (1) stack identified as B-3;
  - (4) One (1) wood furniture sealer coating booth identified as B-4, installed in 1986, rated at 7.5 units per hour, utilizing an air assisted airless or high volume low pressure (HVLP) application system, with particulate matter over spray controlled by dry filter, and exhausting at one (1) stack identified as B-4;

- (5) One (1) wood furniture coating booth identified as B-5, installed in 1986, rated at 7.5 units per hour, utilizing an air assisted airless or high volume low pressure (HVLP) application system, with particulate matter over spray controlled by dry filter, and exhausting at one (1) stack identified as B-5;
  - (6) One (1) wood furniture lacquer coating booth identified as B-6, installed in 1986, rated at 7.5 units per hour, utilizing an air assisted airless or high volume low pressure (HVLP) application system, with particulate matter over spray controlled by dry filter, and exhausting at one (1) stack identified as B-6;
  - (7) One (1) wood furniture lacquer and shade coating booth identified as B-7, installed in 1986, rated at 7.5 units per hour, utilizing an air assisted airless or high volume low pressure (HVLP) application system, with particulate matter over spray controlled by dry filter, and exhausting at two (2) stacks identified as B-7A and B-7B; and
  - (8) One (1) wood furniture coating repair downdraft spray booth identified as B-8, installed in 1986, rated at 7.5 units per hour, utilizing an air assisted airless or high volume low pressure (HVLP) application system, with particulate matter over spray controlled by dry filter, and exhausting at one (1) stack identified as B-8.
- (b) One (1) Plant 2 woodworking operation, installed in or prior to 1976, rated at 1,515 pounds raw materials per hour, including three (3) edge sanders, one (1) 36-inch bands, one (1) boring machine, one (1) multi-drill, one (1) single spindle shape, one (1) horizontal drill, three (3) routers, one (1) tenon machine, one (1) dovetail machine, one (1) automatic sharpener, one (1) mould sander, one (1) belt polisher, one (1) uni-point saw, one (1) sander, and two (2) mortisers, all controlled by one (1) baghouse identified as the Carter-Day Dust Collection System.
  - (c) One (1) bituminous coal fired boiler with underfeed stoker and overfire air, installed in 1975, rated at 5.03 million British thermal units per hour (MMBtu/hr), exhausting at one (1) stack identified as boiler stack.

The source also consists of the following permitted emission units and pollution control devices that have been removed from service during this review process:

One (1) Plant 4 woodworking operation rated at 2,333 pounds raw materials per hour, including two (2) cut-off saws, four (4) rip saws, two (2) moulders, one (1) variable cut-off saw, one (1) chop saw, one (1) double end tenoner, one (1) variety saw, one (1) miter saw, one (1) belt saw, and one (1) band saw, all controlled by one (1) baghouse identified as the Carter-Day Dust Collection System.

#### **Unpermitted Emission Units and Pollution Control Equipment**

There are no unpermitted facilities operating at this source during this review process.

#### **New Emission Units and Pollution Control Equipment Receiving Prior Approval**

There are no new facilities proposed at this source during this review process.

### **Insignificant Activities**

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour. This includes four (4) natural gas-fired drying ovens and three (3) natural gas-fired air make-up units;
- (b) machining where an aqueous cutting coolant continuously floods the machining interface;
- (c) water based adhesives that are less than or equal to 5% by volume of VOCs excluding HAPS;
- (d) blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower;
- (e) one (1) steam air make-up unit;
- (f) one (1) 75 HP air compressor; and
- (g) one (1) 15 HP air compressor.

### **Existing Approvals**

The source has been operating under previous approvals including, but not limited to, the following:

- (a) FESOP (F037-5730-00025) issued on December 13, 1996, and expires on December 13, 2001;
- (b) First Significant Permit Modification 037-8210, issued on July 30, 1997;
- (c) First Administrative Amendment 037-9741, issued on July 22, 1998;
- (d) Second Administrative Amendment 037-10089, issued on September 4, 1998; and
- (e) Third Administrative Amendment 037-10910, issued on June 1, 1999.

All conditions from these approvals were incorporated into this FESOP, except the following conditions have been revised as described (new language bolded and old language crossed-out):

FESOP (F037-5730-00025) on December 13, 1996:

- (a) Section D.2 is revised to eliminate reference to Plant #4 woodworking and make only singular reference to source woodworking operations. These changes are made without replication herein.

Reason for Change: As noted in the **Permitted Emission Units and Pollution Control Equipment** section above, the Plant #4 woodworking operation is removed from the source, and only the Plant #2 woodworking operation remains. The Carter-Day Dust Collection System, previously controlling the Plant #4 woodworking operations, has been moved to Plant #2 to replace the Moldow Dust Collection System and will operate at an identical efficiency rating. The Plant #2 production rate is not affected by this change and, therefore, the potential to emit PM/PM10 remains unchanged. The FESOP limits for the source also remain unaffected by this change.

- (b) Conditions D.1.2 (Volatile Organic Compounds), D.1.3 (Hazardous Air Pollutants), and D.3.2 (Sulfur Dioxide) are revised such that the stated limits are based on a rolling twelve (12) consecutive month compliance period rather than a fixed monthly compliance period. Additionally, Conditions D.1.2 and D.1.4 have been combined into a single limit as Condition D.1.2 since they are both limits for 326 IAC 2-8 (FESOP) compliance.

Reason for Change: Second Administrative Amendment 037-10089, issued on September 4, 1998, approved the use of a straight monthly limit for purposes of demonstrating compliance with Conditions D.1.2, D.1.4 and D.3.2. Recently, however, the source automated their compliance reporting procedures and, on May 7, 2001, they requested that the 12 consecutive month compliance period be re-established. This 12-consecutive month compliance period is consistent with current OAQ permit approvals. Additionally, the limits have been adjusted to reflect the 326 IAC 2-8 program limits based on "less than" 100 tons, 25 tons, 10 tons, and 100 tons per year for emissions of VOC, combined HAPs, single HAP, and SO<sub>2</sub> respectively, rather than the respective 99 tons, 24 tons, 9 tons and 99 tons per year limits implied in the original FESOP. This operating limit format is also consistent with current IDEM, OAQ permit approvals. The following highlights the changes made to original Conditions D.1.2 and D.1.4 (now combined as Condition D.1.2), and Condition D.3.2 with new language bolded and old language crossed-out:

**D.1.2 Volatile Organic Compounds (VOC) (~~Coating Booths B-1 through B-8~~) and Hazardous Air Pollutants (HAPs) [326 IAC 2-8]**

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**The source shall comply as follows:**

- (a) The total ~~amount input usage of~~ volatile organic compounds (VOC) ~~delivered to the applicators of at~~ coating booths B-1 through B-8 combined, including VOC solvent and diluents, shall ~~not exceed 8.15 tons per month~~ **be less than 98.8 tons per twelve (12) consecutive month period. Compliance with this condition shall limit the source-wide potential to emit VOC to less than 100 tons per twelve (12) consecutive month period.**
- (b) **The total input usage of any single hazardous air pollutant (HAP) at coating booths B-1 through B-8, including solvent and diluent usage, shall be less than 9.9 tons per 12 consecutive month period. Compliance with this condition shall limit the source-wide potential to emit a single HAP to less than 10 tons per twelve (12) consecutive month period.**

- (c) **The total input usage of the combined HAPs at coating booths B-1 through B-8, including solvent and diluent usage, shall be less than 24.9 tons per twelve (12) consecutive month period. Compliance with this condition shall limit the source-wide potential to emit total HAPs to less than 10 tons per 12 consecutive month period.**

**Compliance with these limitations shall make** Therefore, the requirements of 326 IAC 2-7 ~~do not apply~~ **(Part 70) not applicable to the source.**

~~D.1.4 Hazardous Air Pollutants~~

~~(a) The total amount of any single hazardous air pollutant (HAP) delivered to the applicators of coating booths B-1 through B-8 combined, including solvents and diluents, shall not exceed 0.75 tons per month.~~

~~(b) The total amount of any combination of HAPs delivered to the applicators of coating booths B-1 through B-8 combined, including solvents and diluents, shall not exceed 2.0 tons per month.~~

~~Therefore, the requirements of 326 IAC 2-7 do not apply.~~

D.3.2 Bituminous Coal Usage **[326 IAC 2-8]**

**The source shall limit** the consumption of bituminous coal from the 5.03 million British thermal units per hour boiler ~~shall be limited to 114.5 tons per month to less than 1,387.5 tons per twelve (12) consecutive month period. Compliance with this condition shall limit the source-wide potential to emit sulfur dioxide (SO<sub>2</sub>) to less than 100 tons per 12 consecutive month period and make~~ the requirements of 326 IAC 2-7 ~~will not apply~~ **(Part 70) not applicable to the source.**

**Enforcement Issue**

There are no Enforcement actions pending during this renewal review.

**Recommendation**

The staff recommends to the Commissioner that the FESOP Renewal be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete FESOP Renewal application for the purposes of this review was received on February 14, 2001. The application was submitted on a timely basis, having been received by OAQ more than nine (9) months before the December 13, 2001 expiration date of the existing original FESOP.

There was no notice of completeness letter was mailed to the source.

**Emission Calculations**

See Appendix A of this document for detailed emissions calculations (eight (8) pages).

## Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source, excluding the emission limits that were contained in the previous FESOP.

Pollutant	Potential To Emit (tons/year)
PM	less than 100
PM-10	less than 100
SO <sub>2</sub>	greater than 100
VOC	greater than 100
CO	less than 100
NO <sub>x</sub>	less than 100

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAP	PTE (tons/year)
methanol	greater than 10
glycol ethers	less than 10
toluene	greater than 10
methyl ethyl ketone (MEK)	greater than 10
formaldehyde	less than 10
xylene	greater than 10
methyl isobutyl ketone (MIBK)	less than 10
TOTAL HAPs	greater than 25

- (a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of sulfur dioxide (SO<sub>2</sub>) and volatile organic compounds (VOC) are both equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of any single HAP is equal to or greater than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) the combination of HAPs is greater than or equal to twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (c) Fugitive Emissions  
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD and Emission Offset applicability.

## Potential to Emit After Issuance

The source, issued a FESOP on December 13, 1996, has opted to remain a FESOP source, rather than apply for a Part 70 Operating Permit. The table below summarizes the potential to emit, reflecting all limits, of the emission units. Any control equipment is considered enforceable only after issuance of this Federally Enforceable State Operating Permit and only to the extent that the effect of the control equipment is made practically enforceable in the permit. Since the source has not constructed any new emission units, the source's potential to emit is based on the emission units included in the original FESOP (F037-5730-00025; issued on December 13, 1996).

Process/facility	Potential to Emit (tons/year) <sup>(1)</sup>						
	PM	PM-10	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>	HAPs
Surface Coating	2.7 <sup>(2)</sup>	2.7 <sup>(2)</sup>	0.0	<del>97.8</del> <b>&lt;98.8</b>	0.0	0.0	<del>24.0</del> <b>&lt;10</b> <sup>(5)</sup>
Woodworking	14.9 <sup>(3)</sup>	14.9 <sup>(3)</sup>	0.0	0.0	0.0	0.0	0.0
Coal Combustion <sup>(4)</sup>	10.4	4.3	<del>99.0</del> <b>&lt;100</b>	0.9	7.6	6.6	negligible
Insignificant Activities (natural gas combustion)	0.1	0.4	negligible	0.3	4.2	4.9	0.1
<b>Total Emissions</b>	28.1	22.0	<del>99.0</del> <b>&lt;100</b>	<del>99.0</del> <b>&lt;100</b>	11.8	11.5	<del>24.0</del> <b>&lt;25</b> <sup>(6)</sup>

Notes:  
1. Values in strikeout reflect limited emissions from FESOP F037-5730-00025, issued December 13, 1996. The values in bold reflect revised limited emissions for this FESOP renewal (see Existing Approvals section of this TSD for detailed explanation).  
2. Reflects uncontrolled potential to emit.  
3. For PM, reflects 326 IAC 6-3-2 allowable emission rate (lb/hr), extrapolated to an equivalent annual basis assuming 8,760 hours of operation. PM10 conservatively set equal to PM.  
4. All facility emissions reflect limited coal usage, per Condition D.3.2.  
5. Reflects limited emissions for a single hazardous air pollutant.  
6. Reflects limited emissions for total hazardous air pollutants.

## County Attainment Status

The source is located in Dubois County.

Pollutant	Status
PM-10	attainment
SO <sub>2</sub>	attainment
NO <sub>2</sub>	attainment
Ozone	attainment
CO	attainment
Lead	attainment

- (a) Volatile organic compounds (VOC) and oxides of nitrogen (NO<sub>x</sub>) are precursors for the formation of ozone. Therefore, VOC and NO<sub>x</sub> emissions are considered when evaluating the rule applicability relating to the ozone standards. Dubois County has been designated as attainment for ozone. Therefore, VOC and NO<sub>x</sub> emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.
- (b) Dubois County has been classified as attainment or unclassifiable for the remaining criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

### Federal Rule Applicability

There are no new federal rules applicable to the source during this FESOP renewal review process. The applicability determination that follows is based on that conducted for original FESOP F037-5730-00025, issued December 13, 1996:

- (a) 40 CFR Part 60, Subpart Dc (Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units)

The coal fired boiler with a maximum heat input rate of 5.03 MMBtu per hour, installed in 1975, is still not subject to the New Source Performance Standard, 326 IAC 12, (40 CFR Part 60.40c through 60.48c, Subpart Dc) because the facility was installed prior to the rule applicability date of June 9, 1989 and it has a maximum heat input rate below the rule applicability threshold of 10 MMBtu per hour.

There are still no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) applicable to this source.

- (b) There are still no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 61) applicable to this source.

- (c) 40 CFR Part 63, Subpart JJ (National Emission Standards for Wood Furniture Manufacturing Operations)

This source is still not subject to the NESHAP for source categories, 326 IAC 20-14, (40 CFR 63, Subpart JJ), *National Emission Standards for Wood Furniture Manufacturing Operations*, for its wood furniture coating processes since the source is not a major source of hazardous air pollutants pursuant to 40 CFR Part 63.2. The source shall limit coating material usage such that source-wide single and combined HAP emissions are limited to less than 10 tpy and 25 tpy, respectively. Therefore this rule does not apply to the source.

There are still no National Emission Standards for Hazardous Air Pollutants (NESHAPs) for source categories (326 IAC 20 and 40 CFR Part 63) applicable to this source.

### State Rule Applicability - Entire Source

There are no new state rules applicable to the entire source during this FESOP renewal review process. The applicability determination that follows is based on that conducted for original FESOP F037-5730-00025, issued December 13, 1996:

#### 326 IAC 1-6-3 (Preventive Maintenance Plan)

The source has submitted a Preventive Maintenance Plan (PMP) on May 3, 2001. This PMP has been verified to fulfill the requirements of 326 IAC 1-6-3 (Preventive Maintenance Plan).

#### 326 IAC 2-2 and 40 CFR 52.21 (Prevention of Significant Deterioration, PSD)

Pursuant to 326 IAC 2-2 and 40 CFR 52.21 (PSD), this source is still not considered a major source because it has the potential to emit less than 250 tons per year of any criteria pollutant and it is not one of the 28 listed source categories. Therefore, the Prevention of Significant Deterioration (PSD) rules, 326 IAC 2-2 and 40 CFR 52.21, do not apply.

326 IAC 2-4.1-1 (New Source Toxics Control)

Pursuant to 326 IAC 2-4.1-1 (New Source Toxics Control), any new process or production unit, which in and of itself emits or has the PTE 10 tons per year of any HAP or 25 tons per year of the combination of HAPs, and is constructed or reconstructed after July 27, 1997, must be controlled using technologies consistent with Maximum Achievable Control Technology (MACT). No facilities with an uncontrolled PTE of 10 tons per year of any single HAP and 25 tons per year of the combination of HAPs have been constructed or reconstructed since July 27, 1997. Therefore, the requirements of 326 IAC 2-4.1-1 (New Source Toxics Control) still do not apply to this source.

326 IAC 2-6 (Emission Reporting)

This source is located in Dubois County which is not one of the specifically listed counties, nor does the source have the potential to emit CO, VOC, NO<sub>x</sub>, PM<sub>10</sub> (including fugitive emissions), or SO<sub>2</sub> in amounts at or exceeding one-hundred (100) tons per year. Therefore, the requirements of 326 IAC 2-6 still do not apply to the source.

326 IAC 2-8-4 (FESOP)

Pursuant to this rule, the amount of PM<sub>10</sub>, SO<sub>2</sub>, VOC, CO and NO<sub>x</sub> shall still be limited to less than one hundred (100) tons per year. Additionally, the source shall comply as follows:

- (a) The total input usage of volatile organic compounds (VOC) at coating booths B-1 through B-8 combined, including VOC solvent and diluents, shall be less than 98.8 tons per twelve (12) consecutive month period. Compliance with this condition shall limit the source-wide potential to emit VOC to less than 100 tons per twelve (12) consecutive month period.
- (b) The total input usage of any single hazardous air pollutant (HAP) at coating booths B-1 through B-8, including solvent and diluent usage, shall be less than 9.9 tons per 12 consecutive month period. Compliance with this condition shall limit the source-wide potential to emit a single HAP to less than 10 tons per twelve (12) consecutive month period.
- (c) The total input usage of the combined HAPs at coating booths B-1 through B-8, including solvent and diluent usage, shall be less than 24.9 tons per twelve (12) consecutive month period. Compliance with this condition shall limit the source-wide potential to emit total HAPs to less than 10 tons per 12 consecutive month period.
- (d) The source shall limit the consumption of bituminous coal from the 5.03 million British thermal units per hour boiler to less than 1,387.5 tons per twelve (12) consecutive month period. Compliance with this condition shall limit the source-wide potential to emit sulfur dioxide (SO<sub>2</sub>) to less than 100 tons per 12 consecutive month period.

Compliance with these limitations shall make the requirements of 326 IAC 2-7 (Part 70) not applicable to the source.

*(Note: See **Existing Approvals** section of this TSD for detailed explanation on changes made to the format of this condition versus that found in the original FESOP. No change to FESOP applicability occurs due to the format change.)*

**326 IAC 5-1-2 (Visible Emission Limitations)**

This source is located in Dubois County, but not in Bainbridge Township where alternate opacity limits apply. Therefore, pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

**326 IAC 6-4 (Fugitive Dust Emissions)**

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions).

**State Rule Applicability - Individual Facilities**

There are no new state rules determined as applicable to individual facilities at this source during this FESOP renewal review process. The applicability determination that follows is based on that conducted for original FESOP F037-5730-00025, issued December 13, 1996:

**326 IAC 6-1 (Particulate Matter)**

Pursuant to 326 IAC 6-1-1 (Applicability), specifically listed sources or facilities, or sources or facilities not specifically listed but located in a listed county and having either a potential to emit (PTE) one hundred (100) tons per year (tpy) or more or actual emissions of ten (10) tpy or more of particulate matter (PM), are subject to the applicable limitation(s).

The source is located in Dubois County, a specifically listed county. The source and its facilities are not specifically listed at 326 IAC 6-1-9 and, therefore, these rules do not apply. The PTE of PM for the source is less than 100 tpy. As controlled facilities operating less than 2,000 hours per year, neither the coating booths nor the Plant #2 woodworking operation have actual PM emissions of 10 tpy. Total actual PM emitted from natural gas combustion, surface coating and woodworking, conservatively based on a full year of 8,760 hours of operation, is only 0.4 tpy (see page 1 of 8, TSD Appendix A). The remaining PM emitting facility, the 5.03 MMBtu/hr coal fired boiler, is uncontrolled but has a limited coal throughput of 1387.5 tpy (Condition D.3.2) and a limited PTE of PM at 10.4 tpy (see page 2 of 8, TSD Appendix A). However, actual coal usage records supplied by the source indicate a maximum actual annual coal usage of only 281 tons since 1997. This actual coal usage equates to PM emissions of only 2.1 tpy for the boiler. When combined with the other facilities, the source-wide actual PM emission rate of 2.5 tpy is less than the rule applicability threshold of 10 tpy actual PM. Therefore, the requirements of 326 IAC 6-1 do not apply.

326 IAC 6-2 (Particulate Emissions Limitations for Sources of Indirect Heating)

Pursuant to 326 IAC 6-2-1, indirect heating facilities not in a specified county and existing and operating prior to September 21, 1983 shall limit particulate matter (PM) emissions according to the equation at 326 IAC 6-2-3. The bituminous coal fired boiler, installed prior to September 21, 1983 and rated at 5.03 million British thermal units per hour (MMBtu/hr), is not located in a specifically listed county and, therefore, shall limit the PM emissions based on the following equation:

$$P_t = \frac{C \times a \times h}{76.5 \times Q^{0.75} \times N^{0.25}}$$

where:  $P_t$  = pounds of PM emitted per MMBtu heat input (lb/MMBtu)  
 $C$  = maximum ground-level concentration (50 micrograms per cubic meter)  
 $a$  = plume rise factor (0.67 for  $Q$  less than 1000 MMBtu/hr)  
 $h$  = stack height (feet)  
 $Q$  = total source operating capacity rating (MMBtu/hr)  
 $N$  = number of stacks in fuel burning operation

The allowable emission rate for the boiler is computed as follows:

$$P_t = (50 \times 0.67 \times 54) / (76.5 \times 5.03^{0.75} \times 1^{0.25})$$

= 7.04 lb/MMBtu; however, pursuant to 326 IAC 6-2-3(e),  $P_t$  shall not exceed 0.6 lb/MMBtu for  $Q$  less than 250 MMBtu.

The boiler shall comply with the allowable PM emission limit of 0.6 lb/MMBtu (see TSD Appendix A, page 2 of 8, for detailed calculations).

326 IAC 6-3-2 (Process Operations)

Pursuant to 326 IAC 6-3-2(c), particulate matter emissions shall be limited as follows:

- (a) The particulate matter as overspray from coating booths B-1 through B-8 each shall not exceed the pound per hour emission rate established as  $E$  in the following formula:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

or

Interpolation and extrapolation of the data for the process weight rate in excess of sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 55.0 P^{0.11} - 40 \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour.}$$

The dry filters shall be in operation at all times the surface coating facilities are in operation in order to comply with this limit.

- (b) The allowable PM emission rate from the Plant #2 woodworking operation shall not exceed 3.40 pounds per hour when operating at a process weight rate of 1,515 pounds per hour. The pounds per hour limitation was calculated with the following equation:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour.}$$

Compliance with this limit is shown through calculation on page 7 of 8, TSD Appendix A. The Carter-Day Dust Collection System (i.e., baghouse) shall be in operation at all times the Plant #2 woodworking equipment is in operation in order to comply with this limit.

#### 326 IAC 7-1 (Sulfur Dioxide Emission Limitations)

This rule requires all facilities with a potential to emit (PTE) at or greater than twenty-five (25) tons per year or ten (10) pounds per hour of sulfur dioxide (SO<sub>2</sub>) to comply with the emission limitations and test compliance methods stated in the rule. The 5.03 MMBtu/hr rated bituminous coal fired boiler is subject to the requirements of this rule since it has a potential sulfur dioxide (SO<sub>2</sub>) emission rate greater than the applicable rule threshold of 25 tons per year (see page 2 of 8, TSD Appendix A). Therefore, pursuant to 326 IAC 7-1.1 (SO<sub>2</sub> Emissions Limitations), the SO<sub>2</sub> emissions from the 5.03 MMBtu per hour boiler shall not exceed six (6.0) pound per million Btu heat input. This is equivalent to a maximum fuel sulfur content of 4.65 percent while combusting coal. The source will continue to comply with this limitation through record keeping.

#### 326 IAC 7-2 (Sulfur Dioxide Compliance Requirements)

This source is subject to 326 IAC 7-1 for the 5.03 MMBtu/hr coal fired boiler. As such, and pursuant to 326 IAC 7-2 (Compliance), the source shall demonstrate compliance with the 326 IAC 7-1 SO<sub>2</sub> emission limitation by recording, and submitting to the OAQ upon request, the information as specified, including coal sulfur content, heat content, fuel consumption, and sulfur dioxide emission rates based on a calendar-month average. This source will continue to comply with this requirement.

#### 326 IAC 8-1-6 (General Volatile Organic Compound Reduction Requirements)

This rule applies to facilities located anywhere in the state that were constructed on or after January 1, 1980, which have potential volatile organic compound (VOC) emissions of 25 tons per year or more, and which are not otherwise regulated by another provision of Article 8. Coating booths B-4 through B-8 are regulated pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), as discussed below. Coating booths 1 through 3 were installed prior to January 1, 1980. Therefore, this rule does not apply.

**326 IAC 8-2-12 (VOC Emission Limitations for Wood Furniture and Cabinet Coating)**

Pursuant to 326 IAC 8-2-1 (Applicability) and 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), facilities constructed in a listed county before November 1, 1980, which are located at a source with potential emissions of 100 tons per year or more of VOC, and which meet the criteria of 326 IAC 8-2-12(a), shall comply with the applicable requirements of 326 IAC 8-2-12. Facilities constructed in any county after January 1, 1980, and which have potential emissions of 25 tons per year or more of VOC, and which meet the criteria of 326 IAC 8-2-12(a), shall likewise comply with the applicable requirements of 326 IAC 8-2-12.

Pursuant to CP 037-3125-00025, issued February 24, 1994, and FESOP F037-5730-00025, issued December 13, 1996, wood furniture coating booths B-4 through B-8 are subject to the provisions of 326 IAC 8-2-12. The source continues to comply with 326 IAC 8-2-12 by using air assisted airless, high volume low pressure (HVLP), roller coating and brush/wipe application methods in booths B4 through B-8, as approved methods of application pursuant to 326 IAC 8-2-12.

Wood furniture coating booths B-1 through B-3 were installed in 1976; however, the source is located in Dubois County which is not a listed county and the requirements of 326 IAC 8-2-12 do not apply to these facilities. While not required by rule to do so, coating booths B-1 through B-3 utilize coating application systems consistent with the requirements of 326 IAC 8-2-12.

**326 IAC 8-6 (Organic Solvent Emission Limitations)**

This rule applies to sources commencing operation after October 7, 1974 and prior to January 1, 1980, located anywhere in the state, with potential solvent VOC emissions of 100 tons per year or more, and not regulated by any other provision of Article 8. This source is regulated by 326 IAC 8-2-12 for coating booths B-4 through B-8. As a FESOP source, coating booths B-1 through B-3, installed in 1976, do not have potential solvent VOC emissions at, or in excess of 100 tons per year. Therefore, the requirements of this rule do not apply.

**Testing Requirements**

Compliance testing is not required of this source since the coating material usage and related VOC and volatile organic HAP emissions assume an emission factor of 2,000 pounds of pollutant emitted per ton of pollutant input to the coating operation, and the woodworking operations are controlled by baghouse with emissions after control well below the allowable particulate matter emission rate.

## Compliance Requirements

Permits issued under 326 IAC 2-8 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-8-4. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

(a) All compliance requirements from previous approvals were incorporated into this FESOP. The compliance monitoring requirements applicable to this source are as follows:

1. The eight (8) wood furniture coating booths identified as B-1 through B-8 have applicable compliance monitoring conditions as specified below:
  - (A) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth B-1 through B-8 stacks (B-1A, B-1B, B-2, B-3, B-4, B-5, B-6, B-7A, B-7B, and B-8) while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
  - (B) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
  - (C) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

2. The Plant #2 woodworking operation has applicable compliance monitoring conditions as specified below:
- (A) Daily visible emission notations of the Carter-Day Dust Collection System stack exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
  - (B) An inspection shall be performed each calendar quarter of all bags controlling the woodworking operation when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting indoors. All defective bags shall be replaced.
  - (C) In the event that bag failure has been observed:
    - (i) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if there are no visible emissions or if the event qualifies as an emergency and the Permittee satisfies the emergency provisions of this permit (Section B- Emergency Provisions). Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
    - (ii) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

These monitoring conditions are necessary because the source must operate properly to ensure compliance with the SO<sub>2</sub>, VOC, and single and combined HAP emissions limits such that the source is limited to less than Title V applicability levels. Additionally, the stated facilities and their control devices must operate properly to ensure compliance with 326 IAC 5 (Visible Emission Limitations), 326 IAC 6-3-2 (Particulate Matter), 326 IAC 7-1.1 (Sulfur Dioxide), 326 IAC 8-2-12 (VOC for Wood Coating Operations), and 326 IAC 2-8-4 (FESOP).

- (b) In addition to the existing compliance monitoring requirements of paragraph (a), the following new compliance monitoring requirement was incorporated into this FESOP Renewal since it meets the OAQ compliance monitoring criteria:
1. The bituminous coal fired boiler has applicable compliance monitoring conditions as specified below:
    - (A) Visible emission notations of the boiler stack exhaust shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
    - (B) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
    - (C) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
    - (D) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
    - (E) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

These monitoring conditions are necessary because the source must operate properly to ensure compliance with 326 IAC 5 (Visible Emission Limitations), 326 IAC 6-3-2 (Particulate Matter), and 326 IAC 2-8-4 (FESOP).

### **Air Toxic Emissions**

Indiana presently requests applicants to provide information on emissions of the 188 hazardous air pollutants (HAPs) set out in the 1990 Clean Air Act. These pollutants are either carcinogenic or otherwise considered toxic and are commonly used by industries. They are listed as air toxics on the Office of Air Quality (OAQ) FESOP Application Form GSD-08.

- (a) This source has accepted federally enforceable air toxic emission limits will emit levels of air toxics less than those which constitute a major source according to Section 112 of the 1990 Clean Air Act.
- (b) See attached calculations for detailed air toxic calculations (TSD Appendix A, eight (8) pages)

### **Conclusion**

The renewed operation of this wood furniture manufacturing plant will be subject to the conditions of the attached proposed FESOP Renewal No. F037-13871-00025.

	<b>Appendix A: Emissions Summary (Page 1 of 8)</b>				
	<b>Company Name: Styline Industries - Plant #2</b>				
	<b>Address City IN Zip: 419 North Washington Street, Huntingburg, IN 47542</b>				
	<b>FESOP Renewal No.: F037-13871-00025</b>				
	<b>Reviewer: Michael Hirtler</b>				
	<b>Date: May 2, 2001</b>				
	<b>Potential Uncontrolled Emissions (tons/year)</b>				
<b>Emissions Generating Activity</b>					
<b>Pollutant</b>	<b>Bituminous Coal Combustion</b>	<b>Natural Gas Combustion</b>	<b>Surface Coating</b>	<b>Woodworking</b>	<b>Total</b>
PM	13.8	0.1	2.7	45.8	62.4
PM-10	5.7	0.4	2.7	45.8	54.6
SO2	132.2	0.0	0.0	0.0	132.2
NOx	8.7	4.9	0.0	0.0	13.6
VOC	1.2	0.3	330.1	0.0	331.6
CO	10.1	4.2	0.0	0.0	14.3
Single HAP	0.0	0.1	38.5	0.0	38.6
Total HAPs	0.0	0.1	102.3	0.0	102.4
Total Uncontrolled Potential Emissions based on rated capacity assuming operations at 8,760 hours per year.					
	<b>Limited Emissions (tons/year)</b>				
<b>Emissions Generating Activity</b>					
<b>Pollutant</b>	<b>Bituminous Coal Combustion</b>	<b>Natural Gas Combustion</b>	<b>Surface Coating</b>	<b>Woodworking</b>	<b>Total</b>
PM	10.4	0.1	0.2	0.1	10.8
PM-10	4.3	0.4	0.2	0.1	5.0
SO2	<100	0.0	0.0	0.0	<100
NOx	6.6	4.9	0.0	0.0	11.5
VOC	0.9	0.3	<98.8	0.0	<100
CO	7.6	4.2	0.0	0.0	11.8
Single HAP	0.0	0.1	<9.9	0.0	<10
Total HAPs	0.0	0.1	<24.9	0.0	<25
* Total Limited Emissions based on rated capacity assuming limited operations, after controls (see Section D of FESOP 037-13871-00025 for specific emission limit conditions).					

**Appendix A: Emissions Calculations**  
**Bituminous Coal Combustion for Underfeed Stoker Boiler**

Page 2 of 8 TSD App A

**Company Name:** Styline Industries - Plant #2  
**Address City IN Zip:** 419 North Washington Street, Huntingburg, IN 47542  
**FESOP Renewal No.:** F037-13871-00025  
**Reviewer:** Michael Hirtler  
**Date:** May 2, 2001

Heat Input Capacity MMBtu/hr	Coal Throughput tons/year	Max. Allowable S = Weight % Sulfur
5.03	1836.0 (potential) 1387.5 (limited)	4.65

Emission Factor in lb/ton	Pollutant					
	PM 15	PM10 6.24	SO2 31 (31S)	NOx 9.5	VOC 1.3	CO 11.0
Potential Emissions (tons/yr)	13.8	5.7	132.2	8.7	1.2	10.1
Limited Emissions (tons/yr)	10.4	4.3	<100	6.6	0.9	7.6

**Methodology**

The PM emission factor is filterable PM only. The PM10 emission factor is filterable and condensable PM10 combined.

VOC emission factor is from Table 1.1-19 (Total non-methane organic carbon).

One (1) pound of bituminous coal has an assumed heating value of 12,000 Btu

Potential Throughput (tons coal/year) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 pound per 0.012 MMBtu x ton/2000 pounds

Emission Factors from AP-42, Chapter 1.1 for industrial underfeed stoker SCC 1-02-002-06/1-03-002-08 (Supplement E, 9/98)

Emission (tons/yr) = Throughput (tons/year) x Emission Factor (lb/ton) / 2,000 lb/ton

**326 IAC 6-2 Compliance Calculation for Particulate Matter (PM):**

The following calculation determines compliance with the 326 IAC 6-2-3 allowable PM emission rate for coal combustion:

Allowable emission rate = 0.6 lb PM per million BTU (lb/MMBtu) by default

Potential emission rate = 13.8 tons PM/yr / 0.6 lb PM/MMBtu (will comply) = 4.38 (lb/hr)/(ton/yr) / 5.03 MMBtu/hr =

**326 IAC 7 Compliance Calculation for Sulfur Dioxide (SO2):**

The following calculation determines the maximum sulfur content of coal allowed thru compliance with the 326 IAC 7-1.1-2:

Allowable emission rate = 6.0 lb SO2 per million BTU (lb/MMBtu), pursuant to 326 IAC 7-1.1-2(a)(1)

6.0 lb SO2 / 10<sup>6</sup> Btu x 12,000 Btu/lb coal \* 2000 lb / ton coal = 144 lb SO2/ton coal  
 144 lb SO2/ton coal / 31 lb SO2 / ton = 4.65 percent (%)

Sulfur content must be less than or equal to 4.65 % to comply with 326 IAC 7-1.1-2.

Facility will comply with the rule by using coal with 1% sulfur content.

**Appendix A: Emissions Calculations  
Bituminous Coal Combustion for Spreader Stoker Boiler  
Hazardous Air Pollutants (HAPs)**

Page 3 of 8 TSD App A

**Company Name:** Styline Industries - Plant #2  
**Address City IN Zip:** 419 North Washington Street, Huntingburg, IN 47542  
**FESOP Renewal No.:** F037-13871-00025  
**Reviewer:** Michael Hirtler  
**Date:** May 2, 2001

Emission Factor in lb/10 <sup>12</sup> Btu	HAPs				total
	Arsenic:	Cadmium:	Lead:		
	1030	43	507		
Limited Emission in tons/yr	1.71E-02	7.16E-04	8.44E-03	0.0	2.63E-02

Methodology is the same as page 4 of 10, plus the following:

Hazardous Air Pollutants (HAPs):  $\frac{5.03 \text{ MMBtu/hr} \times 8760 \text{ hr/yr} \times \text{act. coal use}}{2,000 \text{ lb/ton} \times \text{potential coal use}} \times \text{Ef (lb/10}^{12} \text{ Btu)} = (\text{ton/yr})$

HAP emission factors reflect uncontrolled factors for underfeed stoker boilers presented in AP-42, Chapter 1.1 (Supplement E, 9/98)

**Appendix A: Emission Calculations**  
**Natural Gas Combustion Only**  
**MM BTU/HR <100**

**Company Name:** Styline Industries - Plant #2  
**Address City IN Zip:** 419 North Washington Street, Huntingburg, IN 47542  
**FESOP Renewal No.:** F037-13871-00025  
**Reviewer:** Michael Hirtler  
**Date:** May 2, 2001

Total Heat Input Capacity  
MMBtu/hr

Potential Throughput  
MMCF/yr

0.0	(units <0.3 MMBtu/hr)	0.0	(units <0.3 MMBtu/hr)
11.3	(units >=0.3 MMBtu/hr)	99.0	(units >=0.3 MMBtu/hr)

**Pollutant**

	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	0.6	94.0 100.0 **see below	5.5	40.0 84.0 **see below
Potential Emission in tons/yr	0.1	0.4	0.0	4.9	0.3	4.2

\*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

\*\*Emission Factors for NOx: Uncontrolled = 94 for heat input capacity < 0.3 MMBtu/hr; = 100 for heat input capacity >=0.3 MMBtu/hr

\*\*Emission Factors for CO: Uncontrolled = 40 for heat input capacity < 0.3 MMBtu/hr; = 84 for heat input capacity >=0.3 MMBtu/hr

**Methodology**

Total heat input includes three drying ovens @ 1MMBtu/hr each, and three air make-up units @ 2MMBtu/hr, 2.3 MMBtu/hr and 4 MMBtu/hr.

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPL. D 3/98)

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

**Appendix A: Emissions Calculations**  
**Natural Gas Combustion Only**  
**MM BTU/HR <100**  
**HAPs Emissions**

**Company Name:** Styline Industries - Plant #2  
**Address City IN Zip:** 419 North Washington Street, Huntingburg, IN 47542  
**FESOP Renewal No.:** F037-13871-00025  
**Reviewer:** Michael Hirtler  
**Date:** May 2, 2001

HAPs - Organics

Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	1.039E-04	5.939E-05	3.712E-03	8.909E-02	1.683E-04

HAPs - Metals

Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emission in tons/yr	2.475E-05	5.444E-05	6.929E-05	1.881E-05	1.039E-04

Methodology is the same as page 4 of 8 of TSD, Appendix A.

The five highest organic and metal HAPs emission factors are provided above.  
 Additional HAPs emission factors are available in AP-42, Chapter 1.4.

**Appendix A: Emission Calculations  
VOC and Particulate  
From Surface Coating Operations**

**Company Name:** Styleline Industries - Plant #2  
**Address City IN Zip:** 419 North Washington Street, Huntingburg, IN 47542  
**FESOP Renewal No.:** F037-13871-00025  
**Reviewer:** Michael Hirtler  
**Date:** May 2, 2001

Potential Emissions (uncontrolled):																	
Material (as applied)	Process ID	Density (Lb/Gal)	Weight % Volatile (H2O& Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Vol (solids)	Gal of Mat (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential ton/yr	lb VOC /gal solids	Transfer Efficiency
NGR Stain (#34, NGR)	Booth B-1	6.69	98.80%	0.00%	98.80%	0.00%	0.70%	0.048552	7.50	6.61	6.61	2.41	57.76	10.54	0.00	944.25	75%
SAP Stain (#72 Body SAP)	Booth B-1	6.64	99.50%	0.00%	99.50%	0.00%	0.30%	0.068143	7.50	6.61	6.61	3.38	81.04	14.79	0.00	2202.27	75%
Toner Stain (Light Oak)	Booth B-1	6.81	97.50%	0.00%	97.50%	0.00%	1.30%	0.036712	7.50	6.64	6.64	1.83	43.88	8.01	0.01	510.75	75%
Wash-Out (Vinyl Washcoat)	Booth B-2	7.07	87.60%	0.00%	87.60%	0.00%	8.20%	0.082453	7.50	6.19	6.19	3.83	91.92	16.78	0.08	75.53	75%
Wipe Stain (Clear)	Booth B-3	6.63	95.90%	0.00%	95.90%	0.00%	2.70%	0.102044	7.50	6.36	6.36	4.87	116.79	21.31	0.00	235.49	100%
Filler (#55)	Booth B-3	14.05	19.20%	3.00%	16.20%	5.00%	60.30%	0.001874	7.50	2.40	2.28	0.03	0.77	0.14	0.00	3.77	100%
Sealer (Vinyl Sealer)	Booth B-4	7.26	80.00%	0.00%	80.00%	0.00%	13.70%	0.096763	7.50	5.81	5.81	4.21	101.16	18.46	0.15	42.39	75%
Lacquer (Catalyzed Lacquer)	Booth B-5	7.57	76.80%	0.00%	76.80%	0.00%	16.70%	0.421891	7.50	5.81	5.81	18.40	441.50	80.57	0.81	34.81	75%
Lacquer (Catalyzed Lacquer)	Booth B-6	7.57	76.80%	0.00%	76.80%	0.00%	16.70%	0.421891	7.50	5.81	5.81	18.40	441.50	80.57	0.81	34.81	75%
Lacquer (Catalyzed Lacquer)	Booth B-7	7.57	76.80%	0.00%	76.80%	0.00%	16.90%	0.421891	7.50	5.81	5.81	18.40	441.50	80.57	0.81	34.40	75%
Shade (#70)	Booth B-7	7.05	89.10%	0.00%	89.10%	0.00%	7.20%	0.008177	7.50	6.28	6.28	0.39	9.25	1.69	0.01	87.24	75%
Stain, Sealer or Lacquer Touch-up	Booth B-8	6.81	97.50%	0.00%	97.50%	0.00%	1.30%	0.036712	7.50	6.64	6.64	1.83	43.88	8.01	0.01	510.75	75%
VOC Solvents	All Booths	7.31	100.00%	0.00%	100.0%	0.00%	0.00%	2425	gal / year	7.31	7.31	2.02	48.57	8.86	0.00	ERR	75%
Total Uncontrolled Potential to Emit (tons per year):												<b>75.36</b>	<b>1808.61</b>	<b>330.07</b>	<b>2.68</b>		
Total Limited/Controlled Potential to Emit (tons per year):										12-mos Input Usage Limit	Control Efficiency	Controlled VOC lbs per Hour	Controlled VOC lbs per Day	Controlled VOC tons per Year	Controlled PM tons/yr		
										VOC	PM						
										<b>29.93%</b>	<b>94.00%</b>	<b>75.36</b>	<b>1808.61</b>	<b>&lt; 98.80</b>	<b>0.16</b>		

**Methodology:**

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) \* Weight % Organics) / (1-Volume % water)

Pounds of VOC per Gallon Coating = (Density (lb/gal) \* Weight % Organics)

Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr)

Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr) \* (24 hr/day)

Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr) \* (8760 hr/yr) \* (1 ton/2000 lbs)

Particulate Potential Tons per Year = (units/hour) \* (gal/unit) \* (lbs/gal) \* (1- Weight % Volatiles) \* (1-Transfer efficiency) \* (8760 hrs/yr) \* (1 ton/2000 lbs)

Pounds VOC per Gallon of Solids = (Density (lbs/gal) \* Weight % organics) / (Volume % solids) \* Transfer Efficiency

Total = Sum of Worst Coatings per booth + Sum of all solvents used

Controlled VOC Emission Rate = Uncontrolled Emission Rate \* (1 - VOC Input Limitation)

Controlled PM Emission Rate = Uncontrolled Emission Rate \* (1 - Control Efficiency)

**Notes:**

- Total coating material input usage at booths 1 through 8, including VOC solvents and diluents, shall be limited such that the potential to emit (PTE) VOC is less than 98.8 tons per twelve (12) consecutive month period. This usage limit is required to limit the source-wide PTE VOC to less than 100 tons per 12 consecutive month period. Compliance with this limit makes 326 IAC 2-7 (Part 70) not applicable.
- The source uses several solvents. Actual general solvent usage was stated by the applicant to be 443 gallons over an approximate 1600 hour period. Worst case VOC emissions were estimated by assuming the solvent with the greatest density and 100% organic content (butyl acetate). Actual usage was then adjusted to potential usage through the ratio of 8760 hours/1600 hours.

## Appendix A: Process Particulate Matter Emissions

Page 7 of 8, TSD App A

**Company Name:** Styline Industries - Plant #2  
**Address City IN Zip:** 419 North Washington Street, Huntingburg, IN 47542  
**FESOP Renewal No.:** F037-13871-00025  
**Reviewer:** Michael Hirtler  
**Date:** May 2, 2001

### Potential Uncontrolled Emissions (tons/year)

The following calculations determine emissions from the woodworking operation at Plant 2 based on 8,760 hour of production and hourly PM data collected, as supplied by the applicant.

*Carter-Day Dust Collection System:*

PM/PM10	10.45	pounds collected/hr x	8760	hr/yr	=	45.82	tons / year
	99.9%	control efficiency x	2000	pounds/ton			

### Potential Controlled Emissions (tons/year)

*Carter-Day Dust Collection System:*

PM/PM10	45.82	tons/yr x	0.1%	emitted after controls =	0.05	tons / year
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### 326 IAC 6-3-2 (c) Compliance Calculations

The following calculation determines compliance with 326 IAC 6-3-2(c) for process weight rates less than 30 tons per hour.

$$E = 4.1 * P^{0.67} =$$

where: E = allowable PM emission rate (lb/hr)

P = process weight rate (tons/hr)

*Plant #2 has a process weight rate of 1,515 pounds per hour (0.7575 tons per hour)*

$$E = 4.1 * 0.7575^{0.67} = 3.40 \text{ lb / hr}$$

*Carter-Day Dust Collection System:*

$$0.05 \text{ tons/yr} / 4.38 \text{ (lb/hr)} / \text{(tons/yr)} = 0.01 \text{ lb/hr (will comply)}$$

**Appendix A: Hazardous Air Pollutant (HAP)  
From Surface Coating Operations**

Page 8 of 8 TSD App A

**Company Name:** Styline Industries - Plant #2  
**Address City IN Zip:** 419 North Washington Street, Huntingburg, IN 47542  
**FESOP Renewal No.:** F037-13871-00025  
**Reviewer:** Michael Hirtler  
**Date:** May 2, 2001

Coating or Solvent	Booth ID Number	Amount used per unit (gal/unit)	Production units per hour (units/hr)	Max. Annual Usage (gal/yr)	Coating or Solvent Density (lbs/gal)	Annual Weight of coating or solvent used (lbs/yr)	Methanol	Glycol Ethers	Toluene	MEK	Formalde- hyde	Xylene	MIBK			Total HAPs
							(Weight %) (tons/yr)	(Weight %) (tons/yr)	(Weight %) (tons/yr)	(Weight %) (tons/yr)	(Weight %) (tons/yr)	(Weight %) (tons/yr)	(Weight %) (tons/yr)	(Weight %) (tons/yr)	(Weight %) (tons/yr)	(tons/yr)
N.G.R. Stain (as applied)	B-1	0.048552	7.5	3,190	6.67	21,276	92.0% 9.79	7.0% 0.74	0.0% 0.00	0.0% 0.00	0.0% 0.00	0.0% 0.00	0.0% 0.00	0.0% 0.00	0.0% 0.00	10.53
SAP Stain (as applied)	B-1	0.068143	7.5	4,477	6.64	29,727	95.0% 14.12	5.0% 0.74	0.0% 0.00	0.0% 0.00	0.0% 0.00	0.0% 0.00	0.0% 0.00	0.0% 0.00	0.0% 0.00	14.86
Toner Stain (as applied)	B-1	0.036712	7.5	2,412	6.81	16,426	16.0% 1.31	0.0% 0.00	14.0% 1.15	35.0% 2.87	0.0% 0.00	0.0% 0.00	0.0% 0.00	0.0% 0.00	0.0% 0.00	5.34
Washcoat (as applied)	B-2	0.082453	7.5	5,417	7.07	38,299	0.0% 0.00	0.0% 0.00	17.0% 3.26	19.0% 3.64	0.2% 0.04	0.0% 0.00	0.0% 0.00	0.0% 0.00	0.0% 0.00	6.93
Wipe Stain (as applied)	B-3	0.102044	7.5	6,704	6.63	44,449	0.0% 0.00	0.0% 0.00	7.0% 1.56	3.0% 0.67	0.0% 0.00	0.0% 0.00	0.0% 0.00	0.0% 0.00	0.0% 0.00	2.22
Filler (as applied)	B-3	0.001874	7.5	123	14.05	1,730	0.0% 0.00	2.0% 0.02	0.0% 0.00	0.0% 0.00	0.0% 0.00	0.0% 0.00	0.0% 0.00	0.0% 0.00	0.0% 0.00	0.02
Sealer (as applied)	B-4	0.096763	7.5	6,357	7.26	46,154	9.0% 2.08	0.0% 0.00	10.0% 2.31	10.0% 2.31	0.2% 0.05	2.0% 0.46	0.0% 0.00	0.0% 0.00	0.0% 0.00	7.20
Lacquer (as applied)	B-5	0.421891	7.5	27,718	7.57	209,827	0.0% 0.00	0.0% 0.00	8.0% 8.39	5.0% 5.25	0.3% 0.31	5.0% 5.25	0.0% 0.00	0.0% 0.00	0.0% 0.00	19.20
Lacquer (as applied)	B-6	0.421891	7.5	27,718	7.57	209,827	0.0% 0.00	0.0% 0.00	8.0% 8.39	5.0% 5.25	0.3% 0.31	5.0% 5.25	0.0% 0.00	0.0% 0.00	0.0% 0.00	19.20
Lacquer (as applied)	B-7	0.421891	7.5	27,718	7.57	209,827	0.0% 0.00	0.0% 0.00	8.0% 8.39	5.0% 5.25	0.3% 0.31	5.0% 5.25	0.0% 0.00	0.0% 0.00	0.0% 0.00	19.20
Shade (as applied)	B-7	0.008177	7.5	537	7.05	3,787	0.0% 0.00	0.0% 0.00	14.0% 0.27	21.0% 0.40	0.0% 0.00	0.0% 0.00	0.0% 0.00	0.0% 0.00	0.0% 0.00	0.66
Toner Stain (as applied)	B-8	0.036712	7.5	2,412	6.81	16,426	16.0% 1.31	0.0% 0.00	14.0% 1.15	35.0% 2.87	0.0% 0.00	0.0% 0.00	0.0% 0.00	0.0% 0.00	0.0% 0.00	5.34
Solvents	All Booths	0.036910	7.5	2,425	6.71	16,272	100.0% 8.14	0.0% 0.00	48.1% 3.91	100.0% 8.14	0.0% 0.00	14.2% 1.16	6.0% 0.49	0.0% 0.00	0.0% 0.00	8.14
Total Uncontrolled Potential to Emit (tons per year):							<b>25.65</b>	<b>0.76</b>	<b>38.51</b>	<b>36.23</b>	<b>1.03</b>	<b>17.35</b>	<b>0.49</b>	<b>0.00</b>	<b>0.00</b>	<b>102.29</b>
Total Controlled/Limited Potential to Emit (tons per year):							<b>&lt; 10</b>	<b>&lt; 10</b>	<b>&lt; 10</b>	<b>&lt; 10</b>	<b>&lt; 10</b>	<b>&lt; 10</b>	<b>&lt; 10</b>	<b>&lt; 10</b>	<b>&lt; 10</b>	<b>&lt; 25</b>

Methodology:

Total coating material input usage at booths 1 through 8, including VOC solvents and diluents, shall be limited such that the potential to emit (PTE) single and combined HAPs is less than 10 tons and 25 tons per twelve (12) consecutive month period, respectively. Compliance with these limits shall make the requirements of 326 IAC 2-7 (Part 70) not applicable to the source.

Uncontrolled Potential HAP Emission Rate (tons/yr) = Density (lb/gal) \* Gal of Material (gal/hr) \* Weight % HAP \* 8760 hrs/yr \* 1 ton/2000 lbs (booths that are listed more than once apply coatings on a mutually exclusive basis and the worst case HAP is reflected in the total.

Limited Potential HAP Emission Rate (tons/yr) = Uncontrolled Potential HAP Emission Rate \* Coating Material Input Limit (such that single HAP emissions <10 tpy and total HAP emissions < 25 tpy)

The source uses several solvents. HAP emissions have been computed based on an average density of all solvents and the maximum Weight % (among all solvents) of each HAP.